

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

October 15, 2007

By Facsimile

The Honorable Leonard B. Sand
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street, 1650
New York, New York 10007

**USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 10-16-07**

Re: United States v. Bruno Schuschny,
07 Cr. 372 (LBS)

Dear Judge Sand:

The next pre-trial conference in this case is scheduled for Tuesday, October 16, 2007, at 4:30 p.m. The defendant has agreed to plead guilty to the charges in the above-referenced indictment in the Northern District of New York (where he has other charges pending) pursuant to Fed. R. Crim. P. 20. The paperwork associated with this is in the process of being transmitted from the Southern District of New York to the Northern District of New York.

I have conferred with Philip L. Weinstein, Esq., counsel for defendant, and the parties jointly request that the pre-trial conference scheduled for October 16, 2007, be adjourned approximately thirty days to allow the paperwork to be transmitted, and to allow the defendant to plead potentially plead guilty in the Northern District of New York.

If Your Honor grants the parties' request, then the Government respectfully requests that the Court exclude time from October 16, 2007, until the date set by the Court for the next conference, pursuant to the Speedy Trial Act, Title 18, United States Code, Section 3161(h)(8)(A). The ends of justice served by such continuance outweigh the interest of the public and the defendant in a speedy trial because the continuance will allow the defendant to review discovery, and allow the parties to

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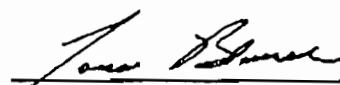
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consider a possible pre-trial disposition. Defense counsel consents to this request for the exclusion of time. A proposed order is attached.


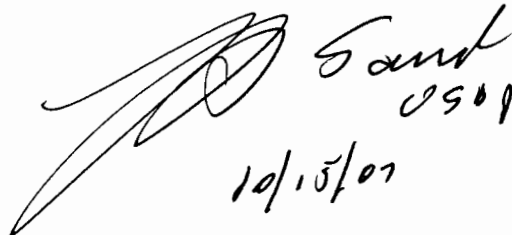
Respectfully submitted,

MICHAEL J. GARCIA
United States Attorney

By:


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cc: Philip L. Weinstein, Esq.
Attorney for Defendant



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